## **REMARKS**

The Office Action dated November 13, 2006 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

In accordance with the foregoing, claims 1, 10, 16, and 44 have been amended to improve clarity of the features recited therein. No new matter is being presented, and approval and entry are respectfully requested. As will be discussed below, it is also requested that all of claims 1-44 be found allowable as reciting patentable subject matter.

Claims 1-44 stand rejected and pending and under consideration.

## REJECTION UNDER 35 U.S.C. § 103:

In the Office Action, at page 4, claims 1-44 were rejected under 35 U.S.C. § 103 as being unpatentable over JP 09-114981 to Igarashi ("Igarashi") in view of "Sure Identification of Individual Terminals in Terms of their Identification Numbers and with the Aid of Authentication Circuits," to H. Eda et al. ("Eda"). The Office Action took the position that Igarashi and Eda disclose all the aspects of claims 1-44. The rejection is traversed and reconsideration is requested.

Independent claim 1, upon which claims 2-9 and 18-33, are dependent, recites an authentication method for identifying a subscriber of a first network in a second network, including accessing a value added service platform in the second network being an internet protocol network from the first network being a general package radio services network by a

terminal of the subscriber, allocating an IP address of the second network to the subscriber, generating information about a mapping between the subscriber's IP address in the second network and a subscriber identity, and transmitting the mapping to the second network. The subscriber is identified in a value added service platform based on the mapping information.

Independent claim 10, upon which claims 11-15 and 34 are dependent, recites an authentication system for identifying a subscriber of a first network in a second network, including a terminal of the subscriber configured to access a value added service platform in the second network being an internet protocol network from the first network being a general packet radio services network by a terminal of the subscriber, a gateway device comprising allocation means for allocating an Internet protocol address of the second network to the subscriber, and authentication client means for generating an information about a mapping between the Internet protocol address of the second network and a subscriber identity, and for transmitting the mapping information to the second network, and an authentication server provided in the second network and configured to log and maintain the mapping information. The authentication server is a server for a value added\_service platform provided in the second network, wherein the value added service platform is configured to identify the subscriber based on the mapping information.

Independent claim 16, upon which claim 17 is dependent, recites a gateway device for connecting a first network to a second network, including an allocation unit configured to allocate an Internet protocol address of the second network to a subscriber of the first network, wherein a terminal of the subscriber is configured to access a value

added service platform in the second network being an internet protocol network from the first network being a general packet radio services network, and an authentication client unit configured to generate information about a mapping between the IP address of the second network and a subscriber identity, and to transmit the mapping information to the Internet protocol network, wherein the authentication client unit is a remote authentication dial in user service client.

Independent claim 44 recites a device configured to connect a first network comprising a general packet radio services network to a second network comprising an Internet protocol network, including means for allocating an Internet protocol address of the second network to a subscriber of the first network, wherein a terminal of the subscriber comprises means for accessing a value added service platform in the second network being an internet protocol network from the first network being a general packet radio services network. The device also include means for generating information about a mapping between the Internet protocol address of the second network and a subscriber identity, and for transmitting the mapping information to the Internet protocol network, wherein the authentication client means is a remote authentication dial in user service client.

As will be discussed below, Igarashi and Eda fail to disclose or suggest the elements of any of the presently pending claims.

Igarashi generally describes a plurality of terminal equipments connected with an internet via a charging proxy. When the terminal equipments perform access to

information providers, the equipments perform access via the charging proxy. When each terminal equipment performs access to the information providers, the charging processing of the use charge is performed.

Although Igarashi appears to show an IP network, however, Igarashi shows a connection to a telephone network. That is, it appears that the two networks involved according to Igarashi are the Internet and telephone lines, as shown in FIG. 18 of Igarashi. FIG. 18 is described in paragraph [0104], for example. At least an embodiment of the present application is directed to the problem identifying the subscriber of a first network in the second network, such as the subscriber in the GPRS network who tries to get access to services in the Internet, as described in the introductory part of the present application.

However, Igarashi does not show a GPRS network. Therefore, Igarashi cannot show or suggest a solution to the problem underlying the present application. Instead, Igarashi deals with a completely different problem, namely with charging of subscribers, but which are not subscribed to another network. Igarashi fails to teach or suggest, at least, "accessing a value added service platform in the second network being an internet protocol network from the first network being a general package radio services network by a terminal of the subscriber," as recited in independent claim 1.

With respect to the feature reciting, "a subscriber is identified in a value added service platform based on mapping information," the Office Action refers to paragraphs [0056] to [0063] and paragraph [0075] of Igarashi. However, in this passage, Igarashi

describes a WWW browser and each information provider is equipped with a WWW server.

Referring to Eda, although Eda appears to describe a GPRS network, Eda does not teach or suggest that a terminal access an IP network from a GPRS network. Eda does not cure the deficiencies of Igarashi. For instance, similarly to Igarashi, Eda fails to teach or suggest, at least, "accessing a value added service platform in the second network being an internet protocol network from the first network being a general package radio services network by a terminal of the subscriber," as recited in independent claim 1. Eda cannot suggest any solutions to the specific problems addressed by the present application.

Nevertheless, regarding this feature, the Office Action refers to a new document, namely U.S. Patent No. 6,469,998 to Burgaleta Salinas et al. ("Burgaleta Salinas"). As described in the abstract of Burgaleta Salinas, this document describes a method for communicating data packets from an eternal packet network to a mobile station via a mobile communications network. A dynamically-assigned packet address is associated with a corresponding mobile subscriber name and identifier. Sending data packets, such a dynamic address (e.g., an IP address) is assigned for this purpose. This is also described in the passage mentioned by the Office Action, that is, column 4, lines 29 to 43, of Burgaleta Salinas.

However, Burgaleta Salinas limits its description to providing essentially a conventional system as described in the "Background of the Invention" of the present

application. Namely, at least one of the problems that the present application addresses is that normally in an IP network, only dynamic addresses are assigned, so that no authentication, charging and the like can be carried out. Burgaleta Salinas, on the other hand, only describes a way of how packet data can be sent to a mobile terminal and vice versa.

Nevertheless, Igarashi, Eda, and Burgaleta Salinas, individually or combined, fail to address the basic problem underlying the present application, which occurs in case a terminal accesses an IP network from a GPRS network in order to obtain VAS services. A combination of the cited references would fail to teach or suggest, at least, "accessing a value added service platform in the second network being an internet protocol network from the first network being a general package radio services network by a terminal of the subscriber," as recited in independent claim 1.

Independent claim 10 recites, in part, "a terminal of the subscriber configured to access a value added service platform in the second network being an internet protocol network from the first network being a general packet radio services network by a terminal of the subscriber," independent claim 16 recites, in part, "wherein a terminal of the subscriber is configured to access a value added service platform in the second network being an internet protocol network from the first network being a general packet radio services network," and independent claim 44 recite, in part, "wherein a terminal of the subscriber comprises means for accessing a value added service platform in the second network being an internet protocol network from the first network being a general

packet radio services network." Because independent claims 10, 16, and 44 include similar claim features as those recited in independent claim 1, although of different scope, and because the Office Action refers to similar portions of the cited references to reject independent claims 10, 16, and 44, the arguments presented above supporting the patentability of independent claim 1 are incorporated herein to support the patentability of independent claims 10, 16, and 44.

## **CONCLUSION:**

In view of the above, Applicant respectfully submits that the claimed invention recites subject matter which is neither disclosed nor suggested in the cited prior art. Applicant further submits that the subject matter is more than sufficient to render the claimed invention unobvious to a person of skill in the art. Applicant therefore respectfully requests that each of claims 1-44 be found allowable and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the Applicant respectfully petitions for an appropriate extension of time.

Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

Registration No. 46,621

Customer No. 32294 SQUIRE, SANDERS & DEMPSEY LLP 14<sup>TH</sup> Floor 8000 Towers Crescent Drive Tysons Corner, Virginia 22182-2700

Telephone: 703-720-7800

Fax: 703-720-7802

AMC:kh